

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

WOLF BARRETTE HARPER,

Defendant.

INDICTMENT

_____/

The Grand Jury charges:

COUNT 1
(Possession or Transfer of Machineguns)

On or about October 9, 2024, in Ingham County, in the Southern Division of
the Western District of Michigan,

WOLF BARRETTE HARPER

knowingly possessed and transferred approximately 20 machinegun conversion
devices, knowing that they were designed and intended solely and exclusively for use
in converting a weapon to shoot automatically more than one shot, without manual
reloading, by a single function of the trigger.

18 U.S.C. § 922(o)

18 U.S.C. § 924(a)(2)

18 U.S.C. § 921(a)(24)

26 U.S.C. § 5845(b)

COUNT 2
(Possession or Transfer of Machineguns)

On or about October 21, 2024, in Ingham County, in the Southern Division of the Western District of Michigan,

WOLF BARRETTE HARPER

knowingly possessed and transferred approximately 50 machinegun conversion devices, knowing that they were designed and intended solely and exclusively for use in converting a weapon to shoot automatically more than one shot, without manual reloading, by a single function of the trigger.

18 U.S.C. § 922(o)

18 U.S.C. § 924(a)(2)

18 U.S.C. § 921(a)(24)

26 U.S.C. § 5845(b)

COUNT 3
(Possession of a Short-Barreled Rifle)

On or about October 21, 2024, in Ingham County, in the Southern Division of the Western District of Michigan,

WOLF BARRETTE HARPER

knowingly possessed a nine-millimeter rifle with no serial number, having a barrel of less than 16 inches in length, knowing that the rifle had a barrel of less than 16 inches in length, which was not registered to him in the National Firearms Registration and Transfer Record.

26 U.S.C. § 5861(d)

26 U.S.C. § 5845(a)

26 U.S.C. § 5871

COUNT 4
(Possession of Machineguns)

On or about October 31, 2024, in Ingham County, in the Southern Division of the Western District of Michigan,

WOLF BARRETTE HARPER

knowingly possessed approximately 30 machinegun conversion devices, knowing that they were designed and intended solely and exclusively for use in converting a weapon to shoot automatically more than one shot, without manual reloading, by a single function of the trigger.

18 U.S.C. § 922(o)

18 U.S.C. § 924(a)(2)

18 U.S.C. § 921(a)(24)

26 U.S.C. § 5845(b)

COUNT 5
(Possession of Machineguns)

On or about October 30, 2024, in Ingham County, in the Southern Division of the Western District of Michigan,

WOLF BARRETTE HARPER

knowingly possessed approximately 20 machinegun conversion devices, knowing that they were designed and intended solely and exclusively for use in converting a weapon to shoot automatically more than one shot, without manual reloading, by a single function of the trigger.

18 U.S.C. § 922(o)

18 U.S.C. § 924(a)(2)

18 U.S.C. § 921(a)(24)

26 U.S.C. § 5845(b)

FORFEITURE ALLEGATION
(Possession or Transfer of Machineguns)

The allegations contained in Counts 1, 2, 4 and 5 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c).

Upon conviction of the offense in violation of 18 U.S.C. § 922(o), set forth in Counts 1, 2, 4 and 5 of this Indictment,

WOLF BARRETTE HARPER

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in or used in the offense, including, but not limited to, the following:

- Count 1: approximately 20 machinegun conversion devices;
- Count 2: approximately 50 machinegun conversion devices;
- Count 4: approximately 30 machinegun conversion devices; and
- Count 5: approximately 20 machinegun conversion devices.

18 U.S.C. § 924(d)(1)
28 U.S.C. § 2461(c)
18 U.S.C. § 922(g)(1)
18 U.S.C. § 922(o)(1)

FORFEITURE ALLEGATION
(Possession of a Short-Barreled Rifle)

The allegations contained in Count 3 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 26 U.S.C. § 5872(a) and 28 U.S.C. § 2461(c).

Pursuant to 26 U.S.C. § 5872(a) and 28 U.S.C. § 2461(c), upon conviction of the violation of 26 U.S.C. § 5861(d) set forth in Count 3 of this Indictment,

WOLF BARRETTE HARPER

shall forfeit to the United States any firearm involved in the commission of the offense including, but not limited to, a nine-millimeter rifle with no serial number.

26 U.S.C. § 5872(a)
28 U.S.C. § 2461(c)
21 U.S.C. § 853(p)
26 U.S.C. § 5861(d)

A TRUE BILL

[/s/ Redacted]

GRAND JURY FOREPERSON

MARK A. TOTTEN
United States Attorney



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